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UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS (CENTRAL DIVISION)

In re:

WALLY M. SABET, a/k/a WALID M. SABET, a/k/a WALED M. SABET, d/b/a WALLY'S AUTO WORLD,

Debtor.

Chapter 7 Case No. 13-43117-HJB

ASSENTED-TO MOTION BY THE CHAPTER 7 TRUSTEE TO EXTEND TIME TO OBJECT TO DEBTOR'S DISCHARGE

To the Honorable Henry J. Boroff, United States Bankruptcy Judge:

NOW COMES Joseph H. Baldiga, the Chapter 7 trustee (the "Trustee") of the bankruptcy estate of Wally M. Sabet, a/k/a Walid M. Sabet, a/k/a Waled M. Sabet, d/b/a Wally's Auto World (the "Debtor"), and hereby moves this Court for an Order pursuant to Rule 4004(b) of the Federal Rules of Bankruptcy Procedure extending the deadline from March 17, 2014 to March 31, 2014 for the Trustee and any other party-in-interest to object to the Debtor's discharge (the "Motion"). The Debtor (via counsel) has assented to this Motion. In support of this Motion, the Trustee submits the following:

- 1. On December 10, 2013, the Debtor filed a voluntary petition for relief under Chapter 7 of the United States Bankruptcy Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code").
- 2. On December 11, 2013, the United States Trustee appointed Joseph H. Baldiga Chapter 7 trustee of the Debtor's bankruptcy case and he continues to serve as such.
- 3. On January 15, 2014, the Trustee conducted the initial meeting of creditors pursuant to Bankruptcy Code § 341(a) (the "§ 341(a) Meeting"). At the § 341(a) Meeting, the

Debtor agreed to provide the Trustee with additional information and documentation on or before February 7, 2014 and the Trustee continued the § 341(a) Meeting to February 12, 2014.

- 4. On January 31, 2014, Debtor's counsel requested that the § 341(a) Meeting be rescheduled and on February 4, 2014 filed a notice rescheduling same to March 20, 2014.
- 5. The current deadline for the Trustee and any other party-in-interest to object to the Debtor's discharge under Bankruptcy Code § 727(a) is March 17, 2014.
- 6. Since the continued § 341(a) Meeting will not take place until March 20, 2014, the Trustee requests that this Court extend to March 31, 2014 the deadline for the Trustee and any other party-in-interest to file objections to the Debtor's discharge.
 - 7. The Debtor (via counsel) has assented to the relief sought herein.

 WHEREFORE, the Trustee respectfully requests that the Court enter an Order:
- (a) Extending the deadline to March 31, 2014 for the Trustee and any other party-ininterest to object to the Debtor's discharge, without prejudice to the right of the Trustee and any

other party-in-interest to seek further extensions of such deadline; and

(b) Granting such other and further relief as is just.

Respectfully submitted,

JOSEPH H. BALDIGA, CHAPTER 7 TRUSTEE

/s/ Joseph H. Baldiga

Joseph H. Baldiga, BBO #549963 Mirick, O'Connell, DeMallie & Lougee, LLP 1800 West Park Drive, Suite 400 Westborough, MA 01581

Phone: 508.898.1501 Fax: 508.898.1502

Email: bankrupt@mirickoconnell.com

Dated: March 12, 2014

ASSENTED TO:

Debtor By his counsel,

/s/ Kenneth P. Doherty Kenneth P. Doherty, Esq. Henry T. Doherty Jr. P.C. 73A Winthrop Ave. Lawrence, MA 01843 Case 13-43117 Doc 26 Filed 03/12/14 Entered 03/12/14 10:02:38 Desc Main Document Page 4 of 9

UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS (CENTRAL DIVISION)

In re:
WALLY M. SABET, a/k/a WALID M.
SABET, a/k/a WALED M. SABET, d/b/a
WALLY'S AUTO WORLD,

Debtor.

Chapter 7 Case No. 13-43117-HJB

ORDER

Upon the Assented-To Motion to Extend Time to Object to Debtor's Discharge dated March 12, 2014 (the "Motion") of Joseph H. Baldiga, Chapter 7 trustee (the "Trustee") of the bankruptcy estate of Wally M. Sabet, a/k/a Walid M. Sabet, a/k/a Waled M. Sabet, d/b/a Wally's Auto World (the "Debtor"), and the Court finding that the notice given of the Motion is sufficient; and no objection to the Motion having been filed or any such objection having been withdrawn or overruled;

NOW, THEREFORE, IT IS HEREBY ORDERED:

- 1. The Motion is ALLOWED.
- 2. The deadline for the Trustee and any other party-in-interest to object to the Debtor's discharge is extended to March 31, 2014.

Dated:	, 2014	
		Honorable Henry J. Boroff
		United States Bankruptcy Court Judge

UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS (CENTRAL DIVISION)

In re: WALLY M. SABET, a/k/a WALID M. SABET, a/k/a WALED M. SABET, d/b/a WALLY'S AUTO WORLD,

Debtor.

Chapter 7 Case No. 13-43117-HJB

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2014, I caused copies of the following documents to be served upon each party noted on the attached Service List by First-Class United States mail, postage pre-paid, or as otherwise noted on the attached Service List:

Assented-To Motion by the Chapter 7 Trustee to Extend Time to Object to Debtor's Discharge, with proposed Order.

/s/ Joseph H. Baldiga

Joseph H. Baldiga, BBO #549963

Mirick, O'Connell, DeMallie & Lougee, LLP

1800 West Park Drive, Suite 400

Westborough, MA 01581 Phone: 508.898.1501

Fax: 508.898.1502

Dated: March 12, 2014 Email: bankrupt@mirickoconnell.com

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Wally M. Sabet, a/k/a Walid M. Sabet, a/k/a Waled M. Sabet, d/b/a Wally's Auto World, Debtor Chapter 7, Case No. 13-43117-HJB

Richard T. King, Esq. Assistant U.S. Trustee Office of U.S. Trustee 446 Main Street 14th Floor Worcester, MA 01608 (U.S. Trustee) VIA ECF	Internal Revenue Service Special Process Unit P.O. Box 9112 Stop 20800 Boston, MA 02203 (Taxing Authority)	Commonwealth of Massachusetts Department of Revenue Litigation Bureau, Bankruptcy Unit P.O. Box 9564 Boston, MA 02114-9564 (Taxing Authority)
Internal Revenue Service PO Box 7346 Philadelphia, PA 19114 (Taxing Authority)	United States Attorney John Joseph Moakley United States Courthouse One Courthouse Way Suite 9200 Boston, MA 02210 (U.S. Attorney)	Wally M. Sabet 297 Andover Street North Andover, MA 01845 (Debtor)
Kenneth P. Doherty, Esq. Hentry T. Doherty, Jr., P.C. 73A Winthrop Avenue Lawrence, MA 01843 (Debtor's Counsel) VIA ECF	Citimortgage, Inc. P.O. Box 9438, Dept. 0251 Gaithersburg, MD 20898 (Schedule D)	Metropolitan Credit Union 200 Revere Beach Parkway Chelsea, MA 02150 (Schedule D)
NextGear Capital, Inc. 1320 City Center Drive, Suite 100 Carmel, IN 46032 (Schedule D)	Shamrock Finance c/o Kimberlee Nauges 141 Wood Road, Suite 200 Braintree, MA 02184 (Schedule D)	Wells Fargo Financial National Bank/Bobs Disc P.O. Box 10438 Des Moines, IA 50306 (Schedule D)
Workers Credit Union 815 Main Street Fitchburg, MA 01420 (Schedule D)	Town of Tewksbury Treasurer/Collector 11 Town Hall Avenue Tewksbury, MA 01876 (Schedule E)	Acme Waste Systems, Inc. P.O. Box 479 Wilmington, MA 01887 (Schedule F)

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Wally M. Sabet, a/k/a Walid M. Sabet, a/k/a Waled M. Sabet, d/b/a Wally's Auto World, Debtor Chapter 7, Case No. 13-43117-HJB

Advanced Auto Parts Professional 1777 Main Street Tewksbury, MA 01876 (Schedule F)	AIG Federal Savings Bank P.O. Box 8733 Wilmington, DE 19899 (Schedule F)	American Express P.O. Box 1270 Newark, NJ 07101 (Schedule F)
Autotrader 3003 Summit Blvd., A-200 Atlanta, GA 30319 (Schedule F)	Bank of America P.O. Box 982235 El Paso, TX 79998 (Schedule F)	Blue Cross Blue Shield 401 Park Drive Boston, MA 02215 (Schedule F)
Cap1/bstby P.O. Box 183195 Columbus, OH 43218 (Schedule F)	CarGurus LLC One Bow Street, 4th Floor Cambridge, MA 02138 (Schedule F)	Carsforsale.com, Inc. P.O. Box 91537 Sioux Falls, SD 57109 (Schedule F)
Citibank USA Citicorp Credit Services/Attn: Centralize P.O. Box 20507 Kansas City, MO 64195 (Schedule F)	Citizens Bank P.O. Box 18204 Bridgeport, CT 06601 (Schedule F)	Citizens Bank P.O. Box 42115 Providence, RI 02940 (Schedule F)
Commerce Insurance 11 Gore Road Webster, MA 01570 (Schedule F)	Dealer Car Search 221 S. Hurstbourne Parkway, Suite 101 Louisville, KY 40222 (Schedule F)	Deetto Card Services P.O. Box 3997 Saint Joseph, MO 64503 (Schedule F)
DER Realty c/o Ray Nickerson 2195 Main Street Tewksbury, MA 01876 (Schedule F)	Dominion 325 John Knox Road, Suite L-200 Tallahassee, FL 32303 (Schedule F)	Dsnb Macys 9111 Duke Blvd. Mason, OH 45040 (Schedule F)
Elan Financial Service 777 E. Wisconsin Avenue Milwaukee, WI 53202 (Schedule F)	GECRB/HH Gregg Attn: Bankruptcy P.O. Box 103104 Roswell, GA 30076 (Schedule F)	Gecrb/Care Credit Attn: Bankruptcy P.O. Box 103104 Roswell, GA 30076 (Schedule F)

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Wally M. Sabet, a/k/a Walid M. Sabet, a/k/a Waled M. Sabet, d/b/a Wally's Auto World, Debtor Chapter 7, Case No. 13-43117-HJB

Gecrb/Sleepys P.O. Box 981439 El Paso, TX 79998 (Schedule F)	GetAuto 325 John Knox Road, Suite L-200 Tallahassee, FL 32303 (Schedule F)	Iris M. Perez 553 White Street Springfield, MA 01108 (Schedule F)
Jeannine Gauthier 33 Dexter Avenue Dracut, MA 01826 (Schedule F)	JP Morgan Chase P.O. Box 15298 Wilmington, DE 19850 (Schedule F)	L&M Radiology, Inc. Brian Murphy MD c/o Merrimack Imaging 500 Merrimack Street Lawrence, MA 01843 (Schedule F)
Lawrence General Hospital One General Street Lawrence, MA 01842 (Schedule F)	Lawrence General Hospital 118 Lukens Drive River Edge Park New Castle, DE 19720 (Schedule F)	Macys P.O. Box 183083 Columbus, OH 43218 (Schedule F)
Methuen Glass 468 Merrimack Street Methuen, MA 01844 (Schedule F)	Metro Credit Union 200 Revere Beach Parkway Chelsea, MA 02150 (Schedule F)	Mojo Motors 150 W. 30th Street, Suite 1200 New York, NY 10001 (Schedule F)
National Credit Center, Inc. P.O. Box 740285 Los Angeles, CA 90074 (Schedule F)	National Grid P.O. Box 1040 Northborough, MA 01532 (Schedule F)	National Grid P.O. Box 960 Northborough, MA 01532 (Schedule F)
Nature Springs Water Co. 55 Franklin Street Needham Heights, MA 02494 (Schedule F)	Pulsar Alarm Systems, Ltd. 4 Wilder Drive, Unit 11 P.O. Box 867 Plaistow, NH 03865 (Schedule F)	Robert Maria c/o Wendy O'Linsky, Esq. 380 Merrimack Street, Suite 2E Methuen, MA 01844 (Schedule F)

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Wally M. Sabet, a/k/a Walid M. Sabet, a/k/a Waled M. Sabet, d/b/a Wally's Auto World, Debtor Chapter 7, Case No. 13-43117-HJB

Sovereign Bank Springleaf Financial Sst/Columbus Bank & Trust P.O. Box 969 Attn: Bankruptcy 1130 Berkshire Blvd. Reading, PA 19610 Evansville, IN 47706 P.O. Box 3997 (Schedule F) St. Joseph, MO 64503 (Schedule F) (Schedule F) Utica National Insurance Vehix.com Wells Fargo Business Direct Group c/o Szabo Associates, Inc. P.O. Box 348750 P.O. Box 6532 3355 Lenox Road NE, #945 Sacramento, CA 95834 Utica, NY 13504 Atlanta, GA 30326 (Schedule F) (Schedule F) (Schedule F)

Workers Credit Union Cardmember Service P.O. Box 6335 Fargo, ND 58125 (Schedule F) WorlkPay 600 Morgan Falls Rd., #260 Atlanta, GA 30350 (Schedule F) Raymond Nickerson, Trustee Danield Nickerson, Trustee D&R Realty Trust 26 Venditto Road Revere, MA 02151

(Property Owner - 2195 Main Street, Tewskbury, MA)